

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

HARRY T. COLLINS,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 05-624-SLR
v.	)	
	)	
WARDEN RAPHAEL WILLIAMS, and	)	Jury Trial Requested
CORRECTIONAL MEDICAL SYSTEMS,	)	
	)	
Defendants.	)	

**NOTICE OF DEPOSITION DUCES TECUM**

**TO:** Mr. Harry T. Collins  
211 Harding Avenue  
Wilmington, DE 19801

**PLEASE TAKE NOTICE** that the oral deposition of Harry T. Collins will be taken by Erika Y. Tross, Deputy Attorney General on Monday, November 19, 2007 at 10:00 a.m.. The deposition will take place at the Delaware Department of Justice, Carvel State Building, 6<sup>th</sup> Floor, 820 N. French Street, Wilmington, Delaware, 19801 and will be transcribed by a professional reporter. Mr. Collins is to bring the following items to the deposition: any and all documents, letters, grievances, sick call slips, medical reports, notes, reports of diagnostic tests, charts, diagrams, images, emergency room or ambulance reports, or any other medical records generated prior to on or following June 1, 2005, which support and/or refute his claim that he was denied proper medical care or treatment while incarcerated at the Howard R. Young Correctional Institution

/s/Erika Y. Tross

Erika Y. Tross (#4506)  
Deputy Attorney General  
Delaware Department of Justice  
Carvel State Office Building  
820 N. French Street, 6th Floor  
Wilmington, DE 19801  
302-577-8400

Dated: October 31, 2007

**CERTIFICATE OF SERVICE**

I, Erika Y. Tross, Esq., hereby certify that on October 31, 2007, I caused a true and correct copy of the attached *Notice of Deposition and Subpoena Duces Tecum* to be served on the following individuals in the form and manner indicated:

**PERSONALLY SERVED UPON/  
AND FIRST CLASS MAIL**

Harry T. Collins  
211 Harding Avenue  
Wilmington, DE 19804

**VIA ELECTRONIC DELIVERY  
& FIRST CLASS MAIL:**

James E. Drnec, Esq.  
Balick & Balick, LLC  
711 King St.  
Wilmington, DE 19801  
jdrnec@balick.com

/s/ Erika Y. Tross  
Erika Y. Tross (#4506)  
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